



# THE KLEIN LAW GROUP, P.C.

KLEIN, KLEIN, TILLES & RUMACK

39 BROADWAY

SUITE 1530

NEW YORK, NY 10006

Phone: 212-344-9022

Fax: 212-344-0301

[www.thekleinlawgroup.com](http://www.thekleinlawgroup.com)

SUSAN KLEIN  
DAVID KLEIN  
LHSJLB TILLES\*

DARREN P.B. RUMACK\*†\*

XIAN-MING LEI†  
STEVEN G. DAVIS  
MATTHEW LEVINE

\*Member N.Y. & N.J. Bar

†Southern District of New York and the Eastern District of New York

\*Also Admitted in District of Columbia

September 23, 2019

Judge Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Molina et al v. Tapper et al.**  
**19-cv-1425 (ENV)(LB)**

Your Honor:

This firm serves as counsel to Plaintiffs in the above matter. Pursuant to your order dated August 20, 2019, I was informed by counsel for Defendants, and counsel for Plaintiff in the parallel case that they had again mediated without success, and do not intend to seek to consolidate cases at this time.

As a result, we request this case be referred to mediation again. Plaintiffs are amenable to using the same mediator as on the parallel case to the extent it is feasible, given his knowledge of several of the issues in this matter.

We thank the Court for its assistance in this matter.

Sincerely,

Darren Rumack

c.c. Michael Taubenfeld (via ECF)  
Attorney for Defendants